

1           **BOIES SCHILLER FLEXNER LLP**  
2           David Boies (admitted *pro hac vice*)  
3           333 Main Street  
4           Armonk, NY 10504  
5           Tel: (914) 749-8200  
6           dboies@bsfllp.com  
7           Mark C. Mao, CA Bar No. 236165  
8           Beko Reblitz-Richardson, CA Bar No. 238027  
9           Erika Nyborg-Burch, CA Bar No. 342125  
10           44 Montgomery St., 41st Floor  
11           San Francisco, CA 94104  
12           Tel.: (415) 293-6800  
13           mmao@bsfllp.com  
14           brichardson@bsfllp.com  
15           enyborg-burch@bsfllp.com  
16           James Lee (admitted *pro hac vice*)  
17           Rossana Baeza (admitted *pro hac vice*)  
18           100 SE 2nd St., 28th Floor  
19           Miami, FL 33131  
20           Tel.: (305) 539-8400  
21           jlee@bsfllp.com  
22           rbaeza@bsfllp.com  
23           Alison L. Anderson, CA Bar No. 275334  
24           725 S Figueroa St., 31st Floor  
25           Los Angeles, CA 90017  
26           Tel.: (213) 995-5720  
27           alanderson@bsfllp.com

1           **SUSMAN GODFREY L.L.P.**  
2           William C. Carmody (admitted *pro hac vice*)  
3           Shawn J. Rabin (admitted *pro hac vice*)  
4           Steven M. Shepard (admitted *pro hac vice*)  
5           Alexander Frawley (admitted *pro hac vice*)  
6           1301 Avenue of the Americas, 32nd Floor  
7           New York, NY 10019  
8           Tel.: (212) 336-8330  
9           bcarmody@susmangodfrey.com  
10           srabin@susmangodfrey.com  
11           sshepard@susmangodfrey.com  
12           afrawley@susmangodfrey.com  
13           Amanda K. Bonn, CA Bar No. 270891  
14           1900 Avenue of the Stars, Suite 1400  
15           Los Angeles, CA 90067  
16           Tel.: (310) 789-3100  
17           abonn@susmangodfrey.com

1           **MORGAN & MORGAN**  
2           John A. Yanchunis (admitted *pro hac vice*)  
3           Ryan J. McGee (admitted *pro hac vice*)  
4           201 N. Franklin Street, 7th Floor  
5           Tampa, FL 33602  
6           Tel.: (813) 223-5505  
7           jyanchunis@forthepeople.com  
8           rmcgee@forthepeople.com  
9           Michael F. Ram, CA Bar No. 104805  
10           711 Van Ness Ave, Suite 500  
11           San Francisco, CA 94102  
12           Tel: (415) 358-6913  
13           mram@forthepeople.com

1           **UNITED STATES DISTRICT COURT**  
2           **NORTHERN DISTRICT OF CALIFORNIA**

3           CHASOM BROWN, WILLIAM BYATT,  
4           JEREMY DAVIS, CHRISTOPHER  
5           CASTILLO, and MONIQUE TRUJILLO  
6           individually and on behalf of all similarly  
7           situated,

8           Plaintiffs,  
9           vs.  
10           GOOGLE LLC,  
11           Defendant.

12           Case No.: 4:20-cv-03664-YGR-SVK

13           **DECLARATION OF BRUCE SCHNEIER**  
14           **IN SUPPORT OF PLAINTIFFS'**  
15           **MOTION FOR CLASS CERTIFICATION**

16           Judge: Hon. Yvonne Gonzalez Rogers  
17           Date: September 20, 2022  
18           Time: 2:00 p.m.  
19           Location: Courtroom 1 – 4th Floor

## DECLARATION OF BRUCE SCHNEIER

I, Bruce Schneier, declare:

1. Counsel for the *Brown* Plaintiffs retained me to provide expert analysis and, if requested, expert testimony, in the *Brown* matter. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this declaration in connection with Plaintiffs' Motion for Class Certification.

3. Attached are true and correct copies of (1) the April 15, 2022 Expert Report that I prepared in connection with this matter, including all appendices; and (2) the June 7, 2022 Expert Rebuttal Report that I prepared in connection with this matter, including all appendices. The opinions I provided therein are true and correct to the best of my knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 20th day of June, 2022, at Cambridge, Massachusetts.

/s/ Bruce Schneier

**Bruce Schneier**  
**4.15.2022 Expert Report and all**  
**Appendices**  
**(Plaintiffs)**

**[Document Filed Under Seal]**

**Bruce Schneier**

**6.7.2022 Rebuttal Expert Report and all  
Appendices  
(Plaintiffs)**

**[Document Filed Under Seal]**